

1 SANDRA B. WICK MULVANY (CO SBN 31972)  
(*Pro Hac Vice*)

2 Email: sandra.wickmulvany@dentons.com  
DENTONS US LLP  
3 1400 Wewatta Street, Suite 700  
Denver, CO 80202  
4 Telephone: (303) 634-4000  
Facsimile: (303) 634-4400

5 ALEXANDRA B. MCLEOD (SBN 8185)

6 Email: abm@thorndal.com  
THORNDAL ARMSTRONG DELK  
7 BALKENBUSH & EISINGER  
1100 E. Bridger Avenue  
8 Las Vegas, NV 89101  
Telephone: (702) 366-0622  
9 Facsimile: (702) 366-0327

10 Attorneys for Defendant  
National Security Technologies, LLC

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 EAGLE ROCK CONTRACTING, LLC,

14 Plaintiff,

15 v.

16 NATIONAL SECURITY  
TECHNOLOGIES, LLC,

17 Defendant.

CASE NO. 2:14-CV-01278-GMN (NJK)

**DEFENDANT NATIONAL SECURITY  
TECHNOLOGIES, LLC'S UNOPPOSED  
MOTION AND MEMORANDUM OF  
POINTS AND AUTHORITIES FOR  
EXTENSION OF TIME TO FILE ITS  
REPLY BRIEFS IN SUPPORT OF ITS TWO  
MOTIONS FOR SUMMARY JUDGMENT  
(First Request)**

19 Pursuant to Federal Rule of Civil Procedure 6(b), and Local Rules 6-1 and 6-2, Defendant,  
20 National Security Technologies, LLC ("NSTec"), respectfully files its unopposed motion seeking  
21 an enlargement of time of ten days, up to and including Thursday, March 3, 2016, in which to  
22 submit its reply in support of its Motion for Summary Judgment on Plaintiff, Eagle Rock  
23 Contracting, LLC's ("ERC"), Claims filed on January 11, 2016 at ECF No. 81, and its reply in  
24 support of its Motion for Summary Judgment on NSTec's Counterclaims filed on January 11,  
25 2016 at ECF No. 82 (collectively, the "Replies").

26 Counsel for NSTec conferred with counsel for ERC regarding the relief requested in this  
27 motion and has been authorized to represent to the Court that ERC does not oppose NSTec's  
28

1 requested extension.

2 NSTec filed both the Motion for Summary Judgment on ERC's Claims and the Motion for  
3 Summary Judgment on NSTec's Counterclaims (collectively, the "Motions for Summary  
4 Judgment") on January 11, 2016. *See* ECF No. 81 and 82, respectively. Yesterday, on February  
5 4, 2016, ERC filed its Oppositions to the Motions for Summary Judgment. *See* ECF No. 87 and  
6 88. Accordingly, NSTec's Replies for the Motions for Summary Judgment are currently due on  
7 February 22, 2016. *See* LR 7-2(e); Fed. R. Civ. P. 6(a)(1) and (d).

8 An unexpired deadline may be extended upon a showing of good cause. Fed. R. Civ. P.  
9 6(b)(1)(A). Here, good cause exists for NSTec's requested ten-day extension of time to file its  
10 Replies. Specifically, NSTec's in-house counsel, who has been working on this case since its  
11 inception, will be traveling out of the country and unavailable beginning this coming weekend and  
12 is not scheduled to return to the United States until February 24, 2016, which is after the  
13 February 22, 2016 deadline for NSTec to file its Replies. NSTec therefore seeks additional time  
14 to allow for its in-house counsel to provide input on the Replies before they are filed with the  
15 Court. NSTec is seeking an extension now, well before the deadline for filing its Replies, based  
16 on these circumstances. *See id.*

17 NSTec has neither requested nor been granted any other enlargement of time to file its  
18 Replies. Further, if granted, the requested enlargement of time for the Replies would not prejudice  
19 any party, delay any scheduled deadline in this case, or otherwise cause any undue hardship to the  
20 parties in this matter. No trial date has been set and there are no other pending deadlines in this  
21 case that would be impacted by the granting of NSTec's requested extension.

22 WHEREFORE, NSTec respectfully requests that the Court enter an Order granting it an  
23 enlargement of time, up to and including Thursday, March 3, 2016, in which to file each of its  
24 Replies, specifically its Reply in support of its Motion for Summary Judgment on ERC's Claims  
25 (ECF No. 81), and its Reply in support of its Motion for Summary Judgment on NSTec's  
26 Counterclaims (ECF No. 82).

1 Dated: February 5, 2016

Respectfully submitted,

2 DENTONS US LLP

3 By: /s/Sandra B. Wick Mulvany  
4 Sandra B. Wick Mulvany

5 Counsel for Defendant,  
6 National Security Technologies, LLC

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8 IT IS SO ORDERED:

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11 United States District Judge

12 Dated: February 17, 2016.  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on this 5th day of February, 2016, a true and correct copy of the foregoing **DEFENDANT NATIONAL SECURITY TECHNOLOGIES, LLC'S UNOPPOSED MOTION AND MEMORANDUM OF POINTS AND AUTHORITIES FOR EXTENSION OF TIME TO FILE ITS REPLY BRIEFS IN SUPPORT OF ITS TWO MOTIONS FOR SUMMARY JUDGMENT (First Request)** was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following individual at the following electronic mail address:

Timothy P. Thomas at tthomas@tthomaslaw.com.

Executed on February 5, 2016, in Denver, Colorado. I declare under penalty of perjury under the laws of the State of Colorado that the above is true and correct.

/s/Sandra B. Wick Mulvany

DN 32298753.1